

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

HODELL-NATCO INDUSTRIES, INC., et al.)	CASE NO.: 1:08 CV 2755
)	
)	
Plaintiffs,)	JUDGE WELLS
)	
vs.)	
)	
SAP AMERICA, INC., et al.,)	<u>LSI-LOWERY SYSTEMS, INC.'S AND IBIS' REQUEST FOR PRODUCTION OF DOCUMENTS TO SAP AND SAP AG</u>
)	
Defendants.)	<u>AND,</u>
)	
)	<u>MOTION TO COMPEL</u>
)	

Now come Defendants, LSI Lowery and IBIS hereby incorporate and adopt as their own all discovery propounded by plaintiff to SAP and SAP AG. Since it would be redundant and a waste of the parties' resources to reproduce the same requests and responses, unless specifically requested by SAP or SAP AG, this request will not be separately issued under the name of these requesting parties. Also, SAP and SAP AG need not separately respond to LSI's discovery requests.

In addition, these parties concur with and join in the Motion to Compel responses to discovery previously filed by Hodell-Natco Industries, Inc.

Respectfully submitted,

/s/ Roy A. Hulme
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing LSI-LOWERY AND IBIS REQUEST FOR PRODUCTION OF DOCUMENTS TO SAP AND SAP AG AND MOTION TO COMPEL was filed electronically this 15th day of March, 2012. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

/s/ Roy A. Hulme
ROY A. HULME (0001090)